

**Exhibit A**

Proposed Order

**UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF NEW JERSEY**

-----	X	
In re:	:	Chapter 11
	:	
BLOCKFI INC., <i>et al.</i> , <sup>1</sup>	:	Case No. 22-19361 (MBK)
	:	
Debtors.	:	(Jointly Administered)
	:	<b>Re: ECF Nos. [ ● ]</b>
-----	X	

**ORDER WITH RESPECT TO THE MOTION  
OF THE JOINT LIQUIDATORS OF THREE ARROWS  
CAPITAL, LTD. FOR COORDINATION AMONG COURTS**

Upon consideration of the motion (the “**Motion**”)<sup>2</sup> of the Joint Liquidators of Thee Arrows Capital, Ltd., for entry of an order authorizing this Court to conference with the BVI Court, the Genesis Court, the FTX Court, and the Chapter 15 Court to establish procedures to adjudicate the overlapping and identical issues of fact and law raised by the 3AC Claims in a centralized forum; and this Court having jurisdiction over this matter pursuant to 28 U.S.C. §§ 157 and 1334; the Motion and the relief requested therein being a core proceeding pursuant to 28 U.S.C. § 157(b); the relief requested in the Motion being in the best interests of the Debtors’ estates, creditors, and other parties-in-interest; proper notice having been given under the circumstances and no further notice is necessary; and after due deliberation thereon, and good and sufficient cause appearing therefor, it is hereby:

---

<sup>1</sup> The debtors in these Chapter 11 Cases, along with the last four digits of each Debtor’s federal tax identification number, are: BlockFi Inc. (0015); BlockFi Trading LLC (2487); BlockFi Lending LLC (5017); BlockFi Wallet LLC (3231); BlockFi Ventures LLC (9937); BlockFi International Ltd. (N/A); BlockFi Investment Products LLC (2422); BlockFi Services, Inc. (5965); and BlockFi Lending II LLC (0154). The location of the Debtors’ service address is 201 Montgomery Street, Suite 263, Jersey City, NJ 07302.

<sup>2</sup> Capitalized terms not defined herein shall have the meanings ascribed in the Motion.

ORDERED that on or before [ ● ], 2023, this Court, the BVI Court, the Genesis Court, the FTX Court, and the Chapter 15 Court shall coordinate in order to establish procedures to adjudicate the common issues of fact and law raised by the 3AC Claims in a centralized forum.

ORDERED that this Court shall retain jurisdiction to resolve any disputes arising from or related to this Order, and to interpret, implement, and enforce the provisions of this Order.

Dated: \_\_\_\_\_, 2023  
Trenton, New Jersey

---

THE HONORABLE MICHAEL B. KAPLAN  
UNITED STATES BANKRUPTCY JUDGE